

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

DOCKET NO. D.T.E. 98-52

RESPONSE OF COMPLAINANTS TO MECO-7

MECO-7 Please provide the number of cable television customers served by each
Complainant as of today's date.

RESPONSE: Attached are the most recently available subscriber counts as these counts relate to
the Massachusetts Electric Company service area communities served by the
Complainants.

Date: July 10, 1998
Responsible Witness: Paul Glist

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

DOCKET NO. D.T.E. 98-52

RESPONSE OF COMPLAINANTS TO MECO-9

MECO-9 For each Complainant, please identify the total attachment fees paid to the Massachusetts Electric Company. Please separately identify the portion of these pole attachment fees attributed to each of the operations identified in the responses to question 5.

RESPONSE: Attached are the annual pole attachment fees paid by the Complainants. This information is based upon invoices from Massachusetts Electric Company.

The Complainants object to the second part of this information request on the ground that the information which it seeks is not relevant to the Department's determination of the reasonableness of Massachusetts Electric Company's proposed pole attachment rates. Please refer to the Complainants' response to information request MECO-6 (the reference to question 5 in the information request above appears to be incorrect).

Date: July 10, 1998

Responsible Witness: Paul Glist/Counsel

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

DOCKET NO. D.T.E. 98-52

RESPONSE OF COMPLAINANTS TO MECO-10

MECO-10 Based on each Complainant's records, please provide the number of attachments to poles owned solely or jointly by Massachusetts Electric. Please describe (1) how each Complainant determined its attachment quantities and (2) the records on which these are based on. Please provide the pole attachment records used to support the response to MECO-9.

RESPONSE: Attached are the number of Complainants' attachments to jointly owned and solely owned poles of Massachusetts Electric. This information is based on the pole attachment invoices of Massachusetts Electric, which are in the possession of Massachusetts Electric Company.

To the extent that this request seeks additional information, Complainants object to this information request on the ground that the information which it seeks is not relevant to the Department's determination of the reasonableness of Massachusetts Electric Company's proposed pole attachment rates. The determination of Massachusetts Electric Company's pole attachment rates is based upon the publicly reported data of Massachusetts Electric Company. *A-R Cable Services, Inc* , D.P.U./D.T.E. 97-82 (1998).

Date: July 10, 1998

Responsible Witness: Paul Glist/Counsel (as to objection)

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

DOCKET NO. D.T.E. 98-52

RESPONSE OF COMPLAINANTS TO MECO-13

MECO-13 Please describe and provide all information relevant to:

1. the training received by communications workers;
2. the qualifications of communications workers to work in the safety space,
3. The cost and expense of equipment used by communications workers for placing attachments on utility poles.

RESPONSE: Without admitting its relevance to this proceeding, Complainants have provided the attached information pertaining to (1) and (2) above.

Complainants object to part (3) of this information request on the ground that their cost and expense of equipment used by communications workers for placing attachments on utility poles is not relevant to the Department's determination of Massachusetts Electric Company's pole attachment fees under G.L.c.166, §25A. Under the Department's decisions in *Greater Media Cable, Inc.*, D.P.U. 91-218 (1992) and *A-R Cable Services, Inc.*, D.P.U./D.T.E. 97-82 (1998), the determination of attachment fees is based upon utility costs from publicly reported accounting data such as the FERC Form 1. Nor are the costs of the Complainants relevant to the determination of other pole attachment rate variables, such as the useable space rebuttable presumption.

Date: July 10 , 1998

Responsible Witness: Paul Glist/Counsel(as to objection)

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

DOCKET NO. D.T.E. 98-52

RESPONSE OF COMPLAINANTS TO MECO-15

MECO-15 Please indicate whether any of the Complainants owns or has considered owning poles for attaching CATV wires. Please explain why each Complainant does or does not own poles.

SUPPLEMENTAL
RESPONSE:

Complainants object to this information request on the ground that the information which it seeks is not relevant to the Department's determination of the reasonableness of Massachusetts Electric Company's proposed pole attachment fees. That determination is based upon the publicly reported data of Massachusetts Electric Company. *Boston Edison Co.*, D.P.U./D.T.E. 97-82 (1998).

Without waiving their objection, Complainants note that in most, if not all cases, utility poles were in place prior to their receipt of cable licenses. Municipalities typically require cable operators to attach to existing utility poles whenever feasible to do so. MediaOne and Greater Media Cable have on rare occasions owned poles where a utility pole was unavailable or unsuitable for attachment. **Charter indicates that it has placed and owns nine poles in the Massachusetts Electric service area due to the lack of continuity from existing MECO or Bell Atlantic poles so that more than one town can be connected with cable wires.**

Date: July 10, 1998

Responsible Witness: Counsel/Paul Glist

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

DOCKET NO. DTE 98-52

SUPPLEMENTAL RESPONSE TO MECO-1

MECO-1 Please provide the current construction procedures and specifications for each of the Complainants, including any construction manuals or standards books.

SUPPLEMENTAL RESPONSE:

Attached is a Cablevision Installation Manual. Cablevision has General Safety and Installer Training Participants Workbooks that are part of an interactive training program. These Workbooks cannot be copied by agreement unless specifically indicated and cannot be transmitted without the written permission of Jones International, Ltd. Counsel is trying to obtain a copy of the above-referenced agreement to ascertain whether copying is permissible under its terms. In the meantime, these Workbooks are available for inspection at counsel's office in Boston.

Date: July 10, 1998
Responsible witness: